

SECTION III—REMARKS

This amendment is submitted in response to the Office Action mailed December 22, 2005. No existing claims are amended, and new claims 15-19 are added. Claims 1-19 remain pending in the application. Applicants respectfully request reconsideration of the application and allowance of all pending claims in view of the above amendments and the following remarks.

Rejections Under 35 U.S.C. § 102

The Examiner rejected claims 1, 3-7, 9, 10 and 12-14 as anticipated under 35 U.S.C. § 102(e) by U.S. Patent No. 6,236,735 to Bjorner *et al.* (“Bjorner”). Applicants respectfully traverse the Examiner’s rejections. A claim is anticipated only if each and every element, as set forth in the claim, is found in a single prior-art reference. MPEP § 2131; *Verdegaal Bros. v. Union Oil of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). As explained below, Applicants respectfully submit that Bjorner cannot anticipate these claims because it does not disclose every element and limitation recited therein.

Claim 1 recites an apparatus combination including a machine-vision system comprising an internal camera operatively connected to an image buffer, and a digital signal processing unit and a camera port connected to the image buffer, wherein the port is adapted to allow an external camera to be connected to the machine vision system “so that the same image buffer can capture images from both the internal camera and the external camera.” Bjorner does not disclose a combination including the recited limitations. Bjorner discloses a system in which a low resolution line buffer 56 captures images from a low resolution line-scan camera 16 and a separate high-resolution line buffer 68 captures images from a high-resolution line-scan camera 22. The Examiner asserts that the general purpose memory 58 is a buffer because the host computer 30 reads both the low and high resolution buffers and transfers information from these two buffers to the general purpose memory.

Applicants respectfully disagree on two grounds. First, words in claim must be given their plain meaning, which is the meaning the term would have to a person of ordinary skill in the art in question at the time of the invention. MPEP § 2111.01 (I)-(II); *Phillips v. AWH Corp.*, F.3d __, 75 USPQ2d 1321 (Fed. Cir. 2005) (en banc); *Sunrace*

Roots Enter. Co. v. SRAM Corp., 336 F.3d 1298, 1302, 67 USPQ2d 1438, 1441 (Fed. Cir. 2003); *Brookhill-Wilk I, LLC v. Intuitive Surgical, Inc.*, 334 F.3d 1294, 1298 67 USPQ2d 1132, 1136 (Fed. Cir. 2003). A buffer is understood by those of ordinary skill in the art to be a memory that temporarily holds data for a short time until it can be transferred elsewhere. Bjorner provides no disclosure, teaching or suggestion that any data transferred to the general purpose memory 58 is only held there temporarily for a short time; in fact, Bjorner teaches that the data resides in the general purpose memory while it is processed by the host computer 30, meaning that it must stay there for a significant amount of time. Bjorner's general purpose memory 58 is therefore not a buffer.

Even if Bjorner's general purpose memory 58 could be considered a buffer—which Applicants do not concede—Bjorner would still not anticipate the claim. The images are captured by the two buffers 56 and 68, not by the general purpose memory 58. Thus, the sources from which data is transferred to the memory 58 are the buffers 56 and 68, not the cameras 16 and 22, and therefore even if general purpose memory 58 could be considered a buffer, it would not be an image buffer that can “capture images from both the internal camera and the external camera.”

For the reasons above, Applicants respectfully submit that Bjorner cannot anticipate the claim because it does not disclose, teach or suggest a combination in which “the same image buffer can capture images from both the internal camera and the external camera.” Applicants submit that claim 1 is therefore allowable and respectfully request withdrawal of the rejection and allowance of the claim.

Regarding claims 3-6, if an independent claim is allowable then any claim depending therefrom is also allowable. See generally MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claim 1 is in condition for allowance. Applicants respectfully submit that claims 3-6 are therefore allowable by virtue of their dependence on an allowable independent claim, as well as by virtue of the features recited therein. Applicants therefore respectfully request withdrawal of the rejections and allowance of these claims.

Claim 7 recites a process combination including capturing a first image using a machine vision system comprising an internal camera, an image buffer, and a digital signal

processing unit, storing or processing the first image, and “capturing a second image using an external camera connected to the same image buffer.” By analogy to the discussion above for claim 1, Applicants submit that Bjorner cannot anticipate this claim because it does not disclose, teach or suggest a process combination including “capturing a second image using an external camera connected to the same image buffer.” Applicants submit that claim 7 is therefore in condition for allowance and respectfully request withdrawal of the rejection and allowance of the claim.

Regarding claim 9, if an independent claim is allowable then any claim depending therefrom is also allowable. *See generally* MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claim 7 is in condition for allowance. Applicants respectfully submit that claim 9 is therefore allowable by virtue of its dependence on an allowable independent claim, as well as by virtue of the features recited therein. Applicants therefore respectfully request withdrawal of the rejections and allowance of this claim.

Claim 10 recites a system combination including an internal camera operatively connected to an image buffer, and a digital signal processing unit, a camera port “connected to the same image buffer,” wherein the port is adapted to allow an external camera to be connected to the machine vision system “so that the same image buffer can capture images from both the internal camera and the external camera.” By analogy to the discussion above for claim 1, Applicants submit that Bjorner cannot anticipate this claim because it does not disclose, teach or suggest a system combination including a camera port “connected to the same image buffer” so that “the same image buffer can capture images from both the internal camera and the external camera.” Applicants submit that claim 10 is therefore in condition for allowance and respectfully request withdrawal of the rejection and allowance of the claim.

Regarding claims 12-14, if an independent claim is allowable then any claim depending therefrom is also allowable. *See generally* MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claim 10 is in condition for allowance. Applicants respectfully submit that claims 12-14 are therefore allowable by virtue of their dependence on an allowable independent claim, as well as by virtue of the features recited

therein. Applicants therefore respectfully request withdrawal of the rejections and allowance of these claims.

New claim 15 recites an apparatus combination including a machine-vision system comprising an internal camera operatively connected to a frame grabber, and a digital signal processing unit and a camera port connected to the frame grabber, wherein the port is adapted to allow an external camera to be connected to the machine vision system “so that the same frame grabber can capture images from both the internal camera and the external camera.” Bjorner does not disclose a combination including these limitations. As discussed above, Bjorner discloses a system in which a low resolution line buffer 56 captures images from a low resolution line-scan camera 16 and a separate high-resolution line buffer 68 captures images from a high-resolution line-scan camera 22. Neither of the buffer 56 and 68, nor the general purpose memory 58, can be considered a frame grabber, and Bjorner therefore cannot disclose, teach or suggest a combination including an internal camera operatively connected to a frame grabber and a camera port connected to the frame grabber, wherein the port is adapted to allow an external camera to be connected to the machine vision system “so that the same frame grabber can capture images from both the internal camera and the external camera.”

Regarding new claims 16-19, if an independent claim is allowable then any claim depending therefrom is also allowable. *See generally* MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, new claim 15 is allowable and new claims 16-20 are therefore allowable by virtue of their dependence on an allowable independent claim, as well as by virtue of the features recited therein. Applicants therefore respectfully request allowance of these claims.

Rejections Under 35 U.S.C. § 103

The Examiner rejected claims 2, 8 and 11 under 35 U.S.C § 103(a) as obvious in view of, and therefore unpatentable over, Bjorner. Applicants respectfully traverse the Examiner’s rejections. If an independent claim is non-obvious under 35 U.S.C. § 103, then any claim depending therefrom is also non-obvious. MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, independent claims 1, 7 and 10, as amended, are in condition for allowance. Applicants respectfully submit that claims 2, 8 and 11 are

therefore allowable by virtue of their dependence on allowable independent claims, as well as by virtue of the features recited therein. Applicants therefore respectfully request withdrawal of the rejections and allowance of these claims.

Conclusion

Given the above amendments and accompanying remarks, all claims pending in the application are in condition for allowance. If the undersigned attorney has overlooked a teaching in any of the cited references that is relevant to allowance of the claims, the Examiner is requested to specifically point out where such teaching may be found. Further, if there are any informalities or questions that can be addressed via telephone, the Examiner is encouraged to contact the undersigned attorney at (206) 292-8600.

Charge Deposit Account

Please charge our Deposit Account No. 02-2666 for any additional fee(s) that may be due in this matter, and please credit the same deposit account for any overpayment.

Respectfully submitted,

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Date: 3-22-06


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